

Department of Energy

Idaho Operations Office 850 Energy Drive Idaho Falls, Idaho 83401-1563

June 18, 2001

Mr. Wayne Pierre, Team Leader Environmental Cleanup Office U.S. Environmental Protection Agency Region X 1200 Sixth Avenue Seattle, Washington 98101

Mr. Dean Nygard, Site Remediation Manager Idaho Department of Environmental Quality 1410 N. Hilton Boise, Idaho 83706

SUBJECT: Contract No. DE-AC07-99ID13727 - Transmittal of Suitability Determination for

Off-Site Facilities to Manage WAG 3 CERCLA Wastes - (EM-ER-01-106)

Dear Mr. Nygard and Mr. Pierre

The Idaho National Engineering and Environmental Laboratory is having CERCLA waste sent to an off-Site facility for treatment. The waste consists of one cylinder of hydrogen fluoride (HF) and one drum of personal protective equipment (PPE). These wastes are CERCLA wastes generated during the implementation of the WAG 3 Group 6 remediation activity.

These CERCLA remediation wastes have been assigned a U134 waste number and are currently being stored at the Onyx Environmental Services Facility in Henderson, Colorado, in accordance with information that we have previously provided. These wastes will be sent to the Treatment One facility, a Division of SET Environmental, Inc., located in Houston, Texas, for treatment. The Treatment One facility was assessed for compliance with the "Off-site Rule" (40 CFR 300.440) on April 6, 2001. Based on information provided by Mr. Ron Shannon, EPA Region 6, the facility was determined to be acceptable for the receipt of CERCLA waste, as identified in the report "ESH&Q Liability Assessment Report of TREATMENT ONE INC Houston. TX" (INEEL/EXT-01-00584). The shipment of this waste to Treatment One is scheduled to occur on or after June 21, 2001.

Following treatment, the empty gas cylinder container will be rendered unusable and recycled. The treated PPE will be shipped for disposal at either the Texas Ecologist Inc. (TECO) facility located in Robstown, Texas, or the Chemical Waste Management (CWM) facility, located in Carlyss, Louisiana. On April 16, 2001, Rhonda Rohe of BBWI Waste Generator Services contacted EPA Region 6 in Dallas, Texas, and spoke with Kathryn M. Griffith regarding the CERCLA off-Site authority status for these two facilities. Ms. Griffith confirmed that both of these facilities have CERCLA off-Site authority per 40 CFR 300.440.

Pierre, Nygard

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Ground transportation using the highway system will be the method used to send this waste to the treatment facility and subsequent disposal facility from the current storage site in Colorado.

Please feel free to contact Talley Jenkins at (208) 526-4978 if you have any questions.

Sincerely,

Jeff Snook, Acting Director

Environmental Restoration Program

cc: Rachel L. Collins, DOE-ID, MS 1117

Talley W. Jenkins, Jr. DOE-ID, MS 1117 F. Lee Smith Letter File, BBWI, MS 3940